

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Washington Regional Office
County: Craven
NC Facility ID: 2500104
Inspector's Name: Betsy Huddleston
Date of Last Inspection: 06/25/2015
Compliance Code: 3 / Compliance - inspection

Facility Data				Permit Applicability (this application only)			
Applicant (Facility's Name): Weyerhaeuser NR Company - Vanceboro Pulp Facility Address: Weyerhaeuser NR Company - Vanceboro Pulp 1785 Weyerhaeuser Road Vanceboro, NC 28586 SIC: 2611 / Pulp Mills NAICS: 32211 / Pulp Mills Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V				SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other: Removed: CAIR			
Contact Data				Application Data			
Facility Contact	Authorized Contact	Technical Contact		Application Number: 2500104.15B Date Received: 08/03/2015 Application Type: Modification Application Schedule: TV-Significant Existing Permit Data Existing Permit Number: 02590/T50 Existing Permit Issue Date: 04/05/2016 Existing Permit Expiration Date: 12/31/2016			
Treva Maxwell-Anderson Sr. Environmental Engineer (252) 633-7427 1785 Weyerhaeuser Road Vanceboro, NC 28586	John Ashley Mill Manager (252) 633-7242 1785 Weyerhaeuser Road Vanceboro, NC 28586	Treva Maxwell-Anderson Sr. Environmental Engineer (252) 633-7427 1785 Weyerhaeuser Road Vanceboro, NC 28586					
Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	266.27	689.85	452.56	305.61	70.80	255.72	199.20 [Methanol (methyl alcohol)]
2013	292.00	750.03	489.45	516.39	76.16	268.98	204.14 [Methanol (methyl alcohol)]
2012	346.01	708.88	685.17	418.23	40.18	297.66	235.63 [Methanol (methyl alcohol)]
2011	505.78	726.44	722.46	480.31	53.54	318.07	251.03 [Methanol (methyl alcohol)]
2010	717.05	712.70	740.77	1723.85	76.84	325.20	252.23 [Methanol (methyl alcohol)]
Review Engineer: Russell Braswell Review Engineer's Signature: _____ Date: _____				Comments / Recommendations: Issue 02590/T51 Permit Issue Date: _____ Permit Expiration Date: _____			

1. Purpose of Application:

Weyerhaeuser NR Company – Vanceboro Pulp (Weyerhaeuser) currently operates under Air Quality Permit 02590T49. The current permit contains references to the Clean Air Interstate Rule (CAIR), which has been replaced by the Cross State Air Pollution Rule (CSAPR). Weyerhaeuser submitted application .15A in order to remove CAIR requirements and make minor modifications. After learning that removing CAIR from the permit would require a public notice period, Weyerhaeuser asked that the two actions be processed separately.

In addition, Weyerhaeuser had previously submitted a 502(b)(10) modification for the boiler ES 161-001. Weyerhaeuser plans to burn biofuel (derived from rendered animal fat) in this boiler. In the 502(b)(10) submittal, Weyerhaeuser demonstrated that burning the biofuel does not emit more pollutants than burning No. 6 fuel oil.

2. Application Chronology:

- August 3, 2015 Application .15B split from .15A.
- August 9 through Internal discussions regarding the transition from CAIR to CSAPR.
August 24, 2015
- February 18, 2016 Application transferred to Russell Braswell.
- February 23, 2016 Initial draft sent to DAQ staff (Mark Cuilla, Samir Parekh, Betsy Huddleston, Yongcheng Chen) and Weyerhaeuser staff (Treva Maxwell-Anderson). For a summary of comments received, see Attachment 2.
- March 2, 2016 Mark Cuilla pointed out that, because this application is considered a significant modification, any existing 502(b)(10) applications should be covered.
- March 3, 2016 Email sent to Treva Maxwell-Anderson regarding the 502(b)(10) applications.
- March 30, 2016 Application forms for the 502(b)(10) application received by email.
- April 5, 2016 T50 permit issued by Brian Bland.
- April 8, 2016 After redrafting the permit to account for the new T50, a new draft permit was sent to DAQ and Weyerhaeuser staff. For a summary of comments received, see Attachment 3.
- XXXXXX Public / EPA notice
- XXXXXX Permit issued

3. Regulatory Review:

a. CAIR requirements

According to 40 CFR 52.35(f) and 52.36(e), CAIR no longer applies as of January 1, 2015. Therefore, references to CAIR have been removed from the permit.

North Carolina's 02D .2400 rules were created to implement CAIR. These rules expired in February 2016 and no longer apply. Therefore, references to the 02D .2400 rules have been removed from the permit.

b. CSAPR requirements

CSAPR (specifically, 40 CFR Part 97, Subparts AAAAA, BBBBB, and CCCCC) was originally scheduled to take effect on January 1, 2012. This rule was planned as a replacement for CAIR. However, CSAPR was challenged in court and initially vacated by the DC Circuit Court. Legal issues were finally resolved in April 2014, when the US Supreme Court reversed that decision. Because the regulation was delayed by court proceedings, the effective date of the rule was moved to January 1, 2015.

This rule explicitly only applies to sources considered large electric generators that produce electricity for sale (see 40 CFR 97.404(a)(1)). Weyerhaeuser does not sell electricity produced by the generators, so they are not subject to CSAPR.

c. Biofuel addition to ES 161-001

Previously, ES 161-001 had been permitted to burn a variety of liquid and gaseous fuels. Weyerhaeuser plans to also burn biofuel (derived from rendered animal fat) in this boiler. The 502(b)(10) application included a summary of emission test results, performed at two Valley Proteins facilities, which shows that the proposed biofuel will not emit more pollution than No. 6 fuel oil would. ES 161-001 is already permitted to burn No. 6. Therefore, the addition of biofuel is not expected to increase potential emissions from the boiler or violate any emission limits.

4. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 2Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA.

Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above.

5. Recommendations

Issue permit 02590T51.

Change List

Page(s)*	Section*	Description of Change(s)
Throughout	Throughout	<ul style="list-style-type: none">• Updated permit/application numbers.• Updated dates.• Fixed formatting errors.• Removed references to CAIR requirements because this rule has expired.
3	Permitted Emission Source List	<ul style="list-style-type: none">• Added biofuel to list of fuels for ES 161-001
	2.1.B.	<ul style="list-style-type: none">• Added references to biofuel.
	2.2.C.	<ul style="list-style-type: none">• Removed all requirements from this section.
	2.2.E.	<ul style="list-style-type: none">• Added note that biofuel is to be included in the annual amount of residual fuel oil burned.

* This refers to the current permit unless otherwise stated.

Comments Received on Initial Draft

- Treva Maxwell-Anderson, by phone call on March 10, 2016
 1. Treva pointed out that Section 2.1.B. still referenced CAIR and did not have references to CSAPR.

Response: This was an omission, and I have fixed it.

2. Treva pointed out that, if Section 2.2.C. were removed, subsequent sections would have to be renumbered.

Response: Rather than renumbering them, I have reserved this section for future use.

3. Treva objected to the inclusion of CSAPR references. This facility is a so-called "orphan facility" and does not currently have requirements under CSAPR.

Response: I had no immediate response to this. I asked Treva to put this in writing and I would research further.

When writing the draft permit, I had been under the impression that, while CSAPR did not have any requirements for non-EGU facilities, it would be amended to include them in the future. Therefore, I put placeholder language in the permit. It appears I was mistaken and non-EGU facilities will likely never be included in CSAPR. Therefore, I agree with Treva and have removed CSAPR from the permit.

Comments Received on Second Draft

- Treva Maxwell-Anderson, by email on April 20, 2016
 1. Treva pointed out that the Table of Changes stated biofuel was added to Section 2.2.B. This should be 2.1.B instead.

Response: Fixed.

2. Treva reminded me that dates and page numbers will have to be updated before the final issuance of the permit.

Response: I understand. I normally do this last to ensure no additional changes are needed.

DRAFT